The 340B Drug Pricing Program: The Basics



Todd Lemke, Pharm.D CDE Paynesville Area Health Care System Pharmacist HRSA APhA Pharmacy Services Support Center Consultant



Intent of the 340B Program



SAVINGS

Improve financial stability

Stretch dollars to serve vulnerable patients



Patients

The 340B Price

340B

DRUG PRICING PROGRAM

25-50%

of the average wholesale price

The 340B price is actually a "ceiling" price





Can offer sub-ceiling prices



340B Entity Eligibility



The eligibility to purchase at the 340B price belongs only to the entities

Previous 340B Entity Eligibility

- Consolidated Health Centers
- Federally Qualified Health Center, or FQHC look-alikes
- Family planning (Title X)
- •Ryan White Care Act (Parts A, B, C, D) grantees
- Black lung clinics

- •Comprehensive hemophilia diagnostic treatment centers
- Native Hawaiian health centers
- Urban Indian organizations
- Certified tuberculosis clinics
- Certain disproportionate share hospitals (>11.75%)
- •Certified sexually transmitted disease clinics

Newly Eligible Program Types

Covered Entity Type	Statutory Definition
Critical Access Hospitals	1820 (c)(2) of SSA
Rural Referral Centers	1886(d)(5)(C)(i) of SSA
Sole Community Hospitals DSH>8%	1886(d)(5)(C)(iii) of SSA
Free Standing Cancer Hospitals	1886 (d)(1)(B)(v) of SSA
Children's Hospitals	1886 (d)(1)(B)(iii) of SSA

OPA website: http://www.HRSA.gov/OPA

340B Enrollment Procedure



ELIGIBLE ENTITIES MUST ENROLL

FORMS AND ENROLLMENT INFORMATION

- http://www.hrsa.gov/opa
- Click on "Legal Resources"

ADMISSION PROCESS

- Submit completed form to OPA
- OPA verifies eligibility
- Participation begins next quarterly database update



340B Enrollment Procedure



FIND THE FORM



http://www.hrsa.gov/opa/legalresources.htm

COMPLETE THE FORM



Click on "Introduction to 340B"

DEADLINES









* participation begins 1 month after the enrollment deadline

340B Regulation and Policy



Definition of a Patient

- 1 entity has established relationship & maintains records of care
- 2 patient receives health care services from health care professional employed/contracted with entity
- 3 patient receives health care consistent with range of services from the covered entity





Federal Register Notice publication



www.hrsa.gov/opa/federalregister.htm

340B Regulation and Policy



If three requirements are not met, the person is not eligible for 340B drugs





Federal Register Notice publication



www.hrsa.gov/opa/federalregister.htm

What services are/are not 340b eligible?

The covered

Outpatient medications

- Used for facilities "patient"
- Written by facilities provider or referred provider

The uncovered

- Inpatient use
- Orphan drug list (for now???)
- Non-"patient"

New opportunity

Contract pharmacy

- 340b eligible entity can contract with one or many non-340b outpatient pharmacy(ies)
- Entity owns medications
- Contract pharmacy gets set dispensing fee
- Does require good record keeping

Integrity Resource:

Office of Pharmacy Affairs (OPA)



Develops
innovative
pharmacy
service models
and supports
technical
assistance

Serves as
Federal resource
for pharmacy
practice

Integrity

Importance of Comprehensive Pharmacy Services

- Access to affordable drugs
- Application of "best practices"
- Efficient pharmacy management
- Systems to improve patient outcome

Access Resource:

Pharmacy Services Support Center (PSSC)

Helps eligible entities, implement and optimize the 340B program



Provides
information
resources,
policy analysis &
education

Access

Operates

- Call Center
- Outreach Program
- Web Site
- Pharmacy Technical Assistance Program

Contacts:





www.hrsa.gov/opa

Pharmacy Services Support Center



1-800-628-6297



pssc@aphanet.org



pssc.aphanet.org

Prime Vendor Program



1-888-340-2787



340B_primevendor@340bpvp.com



www.340bpvp.com

